

**JUDGE PAULEY**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**11 CIV 4914**

x

**Sankofa Bey Sekou**

**DOCKET #**

**Plaintiff,**

**Vs.**

**DEMAND FOR JURY TRIAL**

THE CITY OF NEW YORK; NEW YORK  
CITY POLICE COMMISSIONER RAYMOND  
KELLY, in his individual and official capacity;  
MAYOR MICHAEL BLOOMBERG, in his  
individual and official capacity;  
NEW YORK CITY POLICE OFFICER  
FRED BARRAZA, in his individual capacity;  
NEW YORK CITY POLICE OFFICER  
PIMENTEL, in his individual capacity;  
NEW YORK CITY POLICE SERGEANT OF 110<sup>TH</sup> PRECINCT OF  
UNKNOWN BADGE, in his individual capacity;  
and NEW YORK CITY POLICE OFFICERS, JOHN DOES #1 and  
10 INCLUSIVE, in their individual capacities;  
THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER  
MIHAI POPA  
USED-THINGS STORE CORP.  
LUCERO OF USED-THINGS STORE CORP  
CRAIGSLIST, INC.

FILED  
U.S. DISTRICT COURT  
S.D. OF N.Y.  
2011 JUL 19 PM 1:55

**Defendants,**

x

**PRELIMINARY STATEMENT**

1. This is a civil rights action brought by Plaintiff Sankofa Bey Sekou to seek relief for Defendants' violation of his rights, privileges, and immunities secured by the Civil Rights Act of 1871, 42 U.S.C. § 1983, the Fourth and Fourteenth Amendments to the United States Constitution, Title VI of the Civil Rights

Act of 1964, 42 U.S.C. § 2000(d), *et seq.* ("Title VI"), and the Constitution and laws of the State of New York.

2. The Defendants in this action, the City of New York ("City"), New York City Police Commissioner Raymond Kelly ("Kelly"), the Mayor of the City of New York, Michael Bloomberg ("Bloomberg") and New York City Police Officers Fred Barraza, Pimental, Sergeant of the 110<sup>th</sup> Precinct of the NYPD, Jane Doe and John Does I and 10 inclusive, have implemented and are continuing to enforce, encourage and sanction a policy, practice and/or custom of unconstitutional detentions, "sting operations, malicious prosecutions and frisks of City residents by the New York Police Department ("NYPD").
3. As a result of the said policy, plaintiff on the day of September 28, 2010, was descended upon by a violent MOB OF POLICE OFFICERS OF THE NYPD, 110<sup>th</sup> PRECINCT, who grabbed, shackled, confined, chained, violently struck, beat and dehumanized him and falsely accused him of being in possession of stolen property, which was plaintiff's lawfully acquired private property for which he possessed proof of purchase, store receipt and actual location of store .

4. As a result of the said policy, plaintiff on the day of September 28, 2010, plaintiff was viciously and brutally attacked, beaten, kicked, bruised, injured, and his physical body damaged and tortured as though he was not human.
5. Without JUST CAUSE, a violent MOB OF POLICE OFFICERS OF THE NYPD, 110<sup>th</sup> PRECINCT, which included, but not limited to, OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE, violently attacked the plaintiff in violation of the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution.
6. The NYPD's widespread constitutional abuses have flourished as a result of, and are directly and proximately caused by, policies, practices and/or customs devised, implemented and enforced by the City, Kelly and Bloomberg. The City, Kelly and Bloomberg, and a violent MOB OF POLICE OFFICERS OF THE NYPD, 110<sup>th</sup> PRECINCT, which included, but not limited to, OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY

OF SEPT 28, 2010, AND OFFICERS **JOHN/JANE DOES 1 TO 10 INCLUSIVE**,, have acted with deliberate indifference to the constitutional rights of plaintiff Sean Jerrick and have irreparably damaged him.

7. The City, Kelly and Bloomberg have acted with deliberate indifference to the constitutional rights of plaintiff by: (a) failing to properly screen, train, and supervise NYPD officers, (b) inadequately monitoring NYPD officers and their stop and frisk practices, (c) failing to sufficiently discipline NYPD officers who engage in constitutional abuses, and (d) encouraging, sanctioning and failing to rectify the NYPD's unconstitutional practices.
8. As a direct and proximate result of defendants' policies, practices and/or customs, plaintiff was subjected to violent and malicious unconstitutional seizure, confiscation, brutality, and dehumanization by the named NYPD officers in this complaint.

### **JURISDICTION**

Jurisdiction is conferred upon this Court under 28 U.S.C. §§ 1331 and 1343(3) and (4), as this action seeks redress for the violation of Plaintiff's constitutional and civil rights. Plaintiff's claims for declaratory and

injunctive relief are authorized by 28 U.S.C. §§ 2201 and 2202 and Rule 57 of the Federal Rules of Civil Procedure.

9. Plaintiff further invoke this Court's supplemental jurisdiction, pursuant to 28 U.S.C. § 1367(a), over any and all state constitutional and state law claims that are so related to the claims within the original jurisdiction of this Court that they form part of the same case or controversy.

#### **VENUE**

10. Venue is proper in the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1391 (b) and (c).

#### **JURY DEMAND**

11. Plaintiff demands trial by jury in this action on each and every one of his claims.

#### **PARTIES**

12. Plaintiff Sankofa Bey Sekou (“Bey”) is an African-American who resides in the Borough of Queens, where active and rampant frisks, stops, and unconstitutional seizures take place daily.

**DEFENDANTS**

13. Defendant CITY OF NEW YORK ("City") is a municipal entity created and authorized under the laws of the State of New York. It is authorized under the laws of the State of New York to maintain a police department, the NYPD, which acts as its agent in the area of law enforcement and for which it is ultimately responsible. The City assumes the risks incidental to the maintenance of a police force and the employment of police officers. The NYPD's operations include the operations as described herein. On information and belief, the law enforcement activities of the NYPD are funded, in part, with funds from the federal government.
14. Defendant New York City Police Commissioner RAYMOND KELLY is and was, at all times relevant herein, the Police Commissioner for the City, and is and was responsible for, and the chief architect of, the policies, practices and or customs of the NYPD, a municipal agency of the City. He is and was, at all times relevant herein, responsible for the hiring, screening, training, retention, supervision, discipline, counseling and control of the police officers under his command who are or

were employed by the NYPD, including the Defendants named herein. He is sued individually and in his official capacity.

15. Defendants NEW YORK CITY POLICE OFFICERS which included, but not limited to, OFFICER FRED BARRAZA, **TAX REG# 941395**, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS **JOHN/JANE DOES 1 TO 10 INCLUSIVE** are or were, at all times relevant herein, officers, employees, and agents of the NYPD, a municipal agency of the City.  
Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, **TAX REG# 941395**, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS **JOHN/JANE DOES 1 TO 10 INCLUSIVE**, are sued in their individual capacities.
16. Defendant MICHAEL BLOOMBERG is and was, at all times relevant herein, the Mayor of the City of New York and the chief policy making official for the City and its departments, including the NYPD. He is sued in both his individual and official capacities.

17. At all times relevant herein, Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE, Kelly and Bloomberg have acted under color of state law in the course and scope of their duties and functions as agents, employees, and officers of the City and/or the NYPD in engaging in the conduct described herein. At all times relevant herein, Defendants have acted for and on behalf of the City and/or the NYPD with the power and authority vested in them as officers, agents and employees of the City and/or the NYPD and incidental to the lawful pursuit of their duties as officers, employees and agents of the City and/or the NYPD.
18. At all times relevant herein, Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE, Kelly and Bloomberg have violated clearly established constitutional

standards under the Fourth Amendment and the Equal Protection Clause of the Fourteenth Amendment of which a reasonable person would have known.

19. Defendant, MIHAI POPA, is the individual who falsely reported to the police about an alleged missing bicycle which lawfully belonged to plaintiff, but upon information and belief appears to be an agent of the NYPD working in concert with them in sting operations, by responding to a listing placed on CRAIGSLIST.
20. Defendant, USED THINGS STORE CORP and LUCERO OF USED THINGS STORE CORP, are the entities that plaintiff purchased the bicycle in this action from on 9/28/2010.
21. Defendant, CRAIGSLIST is sued here solely to produce and reveal the identification of MIHAI POPA, who used their database to respond to the listing placed on their web site by plaintiff.

#### **STATEMENT OF FACTS**

22. Plaintiff repeats and re-alleges paragraphs from one to twenty-one above as if fully set herein.
23. On the day of September 28, 2010, plaintiff bought a WINDSOR SPEED 56CM FRAME BICYCLE, from defendant

USED-THINGS STORE CORP, and subsequently listed it on CRAIGSLIST TO RE-SELL ON THE SAME DAY. (Please see the proof of purchase as exhibit A, copy of the listing on CRIAGSLIST as exhibit B, and a copy of the picture of the said bicycle as exhibit C, all attached herein and fully incorporated.)

24. On the same day, 9/28/2010, a certain individual now identified as defendant MIHAI POPA, responded to plaintiff's posting on CRAIGSLIST and offered to purchase the said bicycle.
25. Plaintiff and defendant MIHAI POPA agreed to meet on 9/28/2010, to consummate the transaction.
26. On or about 6:00 pm and 7:00 pm, plaintiff arrived at the pre-agreed location to transact a lawful exchange with this alleged "buyer"
27. But to his dismay, shock, perplexity, when he arrived at the location on 111 Street and Roosevelt Avenue with the bicycle, he was swooped down upon by a violent MOB OF NEW YORK CITY POLICE DEPARTMENT OFFICERS from the 110<sup>th</sup> precinct, including but not limited to, FRED BARRAZA, TAX REG# 941395, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE who literally emerged from nowhere and came

hauling profanities, curse words, totting guns, and commanding plaintiff to go on the ground.

28. The violent MOB OF NEW YORK CITY POLICE DEPARTMENT OFFICERS from the 110<sup>th</sup> precinct, including but not limited to, FRED BARRAZA, TAX REG# 941395, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE, immediately pounced upon defendant and began beating and kicking plaintiff and accused him of being in possession of stolen property, to wit the bicycle.
29. Plaintiff vocally informed the MOB that he bicycle was his legitimately acquired private property and offered to produce documentation to that effect as proof
30. But the MOB OF POLICE OFFICERS from the 110<sup>th</sup> precinct, including but not limited to, FRED BARRAZA, TAX REG# 941395, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE, ignored plaintiff but instead brutalized his body cuffed his legs, and then chained his hands to his back and dragged him like a common slave into their patrol car after beating him repeatedly for a long period of time.

31. Plaintiff informed the MOB OFFICERS that they had severely injured him and that his shoulder legs, arms, elbows were in writhing pain and anguish.
32. The MOB OFFICERS drove plaintiff to ELMHURST HOSPITAL CENTER EMERGENCY ROOM, after leaving him in pain for THREE HOURS, WITHOUT MEDICAL ATTENTION, where he was admitted under police surveillance and chained to the hospital bed. (please see **exhibit D**, the proof of the medical reports from ELMHURST)
33. On the day of 9/29/2010, plaintiff, now in anguish and pain, was driven to the 110<sup>th</sup> precinct (after spending 12 hours chained to the bed at ELMHURST) where the Sergeant of the precinct on that day, told plaintiff that he was “**HIS SLAVE AND THEREFORE MUST DO AS HE WAS TOLD** or lose his life.”
34. Plaintiff has subsequently filed CLIAMS with the CITY OF NEW YORK OFFICE OF THE COMPTROLLER, who has remained aloof with respect to providing a befitting remedy to plaintiff's torment, anguish, harm and irreparable damages to his person, and dignity.

35. The violent MOB OF NEW YORK CITY POLICE DEPARTMENT OFFICERS from the 110<sup>th</sup> precinct, including but not limited to, FRED BARRAZA, TAX REG# 941395, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE deliberately and indifferently while acting under color of law, violated the constitutional rights of plaintiff Bey and have irreparably damaged him.

### **FIRST CLAIM**

#### **(Claims Pursuant to 42 U.S.C. § 1983 Against All Defendants for Violations of the Fourth Amendment)**

36. Plaintiff repeats and re-alleges paragraphs from one to thirty-five above as if fully set herein.
37. The City, Kelly and Bloomberg, and The violent MOB OF NEW YORK CITY POLICE DEPARTMENT OFFICERS from the 110<sup>th</sup> precinct, including but not limited to, FRED BARRAZA, TAX REG# 941395, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE have implemented, enforced, encouraged and sanctioned a policy, practice and/or custom of stopping and seizing African Americans without the legitimate cause or reasonable articulable suspicion of

criminality required by the Fourth Amendment. These constitutional abuses and its twin unconstitutional searches and seizures and the use of excessive force have now become a huge blot on the face of the City of New York.

38. The NYFD's constitutional abuses and violations were and are directly and proximately caused by policies, practices and/or customs devised, implemented, enforced, encouraged and sanctioned by the City, Kelly and Bloomberg, including: (1) the failure to adequately and properly screen, train, and supervise NYPD officers; (2) the failure to properly and adequately monitor and discipline NYPD officers; and (3) the overt and tacit encouragement and sanctioning of, and the failure to rectify, the NYPD's unconstitutional seizures, brutality and violence against African American Nationals.
39. Each of the Defendants has acted with deliberate indifference to the Fourth Amendment rights of Plaintiff. As a direct and proximate result of the acts and omissions of each of the Defendants, Plaintiff's Fourth Amendment rights have been violated. By acting under color of state law to deprive Plaintiff of his rights under the Fourth Amendment, the Defendants are in

violation of 42 U.S.C. § 1983, which prohibits the deprivation under color of state law of rights secured under the United States Constitution.

40. The NYPD targets Black and Latino individuals for illegal stops and frisks which result to unconstitutional seizures, violence and possible deaths in plaintiff's neighborhood. Thus, a real and immediate threat exists that Plaintiff's Fourth Amendment rights will be violated by NYPD officers in the future. Moreover, because Defendants' policies, practices and/or customs subjected Plaintiff to violent stops and frisks without any reasonable, articulable suspicion of criminality, and often on the basis of race and/or national origin, plaintiff cannot alter their behavior to avoid future violations of their Constitutional and civil rights at the hands of the NYPD.

41. Plaintiff has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from continuing the NYPD's policy, practice and/or custom of no constitutional stops and frisks, and the policies, practices and/or customs that have directly and proximately caused such constitutional abuses.

## SECOND CLAIM

### (Claims Pursuant to 42 U.S.C. § 1983 Against All Defendants for Violations of Equal Protection Clause)

42. Plaintiff repeats and re-alleges paragraphs from one to forty-one above as if fully set herein.
43. The City, Kelly and Bloomberg, a violent MOB OF NEW YORK CITY POLICE DEPARTMENT OFFICERS from the 110<sup>th</sup> precinct, including but not limited to, FRED BARRAZA, TAX REG# 941395, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE have implemented, enforced, encouraged and sanctioned a policy, practice and/or custom of stopping and frisking individuals without the reasonable articulable suspicion of criminality required by the Fourth Amendment. These constitutional abuses and its twin unconstitutional searches and seizures and the use of excessive force have now become a huge blot on the face of the City of New York.
44. The NYPD targets Black and Latino individuals for NYPD's unconstitutional seizures, brutality and violence against African American Nationals. Thus, a real and immediate threat exist that Plaintiff's Fourth Amendment rights will be violated by

NYPD officers in the future. Moreover, because Defendants' policies, practices and/or customs subjected Plaintiff to violent stops, frisks and seizures without any reasonable, articulable suspicion of criminality, and often on the basis of race and/or national origin, plaintiff cannot alter their behavior to avoid future violations of their Constitutional and civil rights at the hands of the NYPD.

45. Plaintiff has no adequate remedy at law and will suffer serious and irreparable harm to his constitutional rights unless Defendants are enjoined from continuing the NYPD's policy, practice and/or custom of no constitutional stops and frisks, and the policies, practices and/or customs that have directly and proximately caused such constitutional abuses.

**THIRD CLAIM (Claims under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000(d), *et seq.* Against the City of New York)**

46. Plaintiff repeats and re-alleges paragraphs from one to forty-six above as if fully set herein.
47. The law enforcement activities described in this complaint have been funded, in part, with federal funds.

48. Discrimination based on race in the law enforcement activities and conduct described in this complaint are prohibited under 42 U.S.C. § 2000(d), *et seq.* The acts and conduct complained of herein by the Defendants were motivated by racial animus, and were intended to discriminate on the basis of race and/or had a disparate impact on minorities, particularly Blacks and Latinos.
49. As a direct and proximate result of the above mentioned acts, Plaintiff has suffered injuries and damages and has been deprived of his rights under the civil rights laws. Without appropriate injunctive relief, these violations will continue to occur.

#### **FOURTH CLAIM**

**(Plaintiff Sean's Claims Pursuant to 42 U.S.C. § 1983 Against Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE)**

50. Plaintiff repeats and re-alleges paragraphs from 1 to 49 above as if fully set herein.

51. The conduct of defendants NYPD OFFICER Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE in engaging in and promoting and enforcing a sting operation of a violent unconstitutional seizures due to plaintiff's Nationality and Skin color, performed under color of law has left plaintiff irreparably scarred him forever and constitutes racial profiling at its most despicable description.
52. As a direct and proximate result of such acts, defendants NYPD OFFICER Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE deprived Plaintiff Bey of his Fourth and Fourteenth Amendment rights in violation of 42 U.S.C. § 1983.
53. As a direct and proximate result of those constitutional abuses, Plaintiff Bey has suffered and will continue to suffer physical,

mental and emotional pain and suffering, mental anguish, embarrassment and humiliation.

54. The acts of defendants NYPD OFFICER Defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE were intentional, wanton, malicious, reckless and oppressive, thus entitling Plaintiff Sean to an award of punitive damages.

#### **FIFTH CLAIM**

##### **(Violation of Plaintiff's Rights Under New York Law)**

55. Plaintiff repeats and re-alleges paragraphs from 1 to 54 above as if fully set herein.
56. By the actions described above, each and every Defendant, jointly and severally, has committed the following wrongful acts against Plaintiffs, which are tortious under the Constitution and laws of the State of New York:
- a) assault and battery;
  - b) trespass;
  - c) violation of the right to privacy;

d) negligence; and

e) violation of rights otherwise guaranteed under the Constitution and laws of the State of New York.

57. In addition, Defendants City, Kelly and Bloomberg were negligent in their hiring, defendants NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE.
58. **WHEREFORE**, plaintiff as to all his causes of action demands the sum of 20 million dollars (\$20 million dollars) against all defendants, THE CITY OF NEW YORK, and against NEW YORK CITY POLICE OFFICER FRED BARRAZA, TAX REG# 941395, OFFICER PIMENTEL, SERGEANT OF THE 110<sup>TH</sup> precinct on the DAY OF SEPT 28, 2010, AND OFFICERS JOHN/JANE DOES 1 TO 10 INCLUSIVE in their individual capacities as restitution, reparation, and punitive damages for all their reprehensible violent acts and bodily harm and damages sustained in the hands of all defendants.

59. Award such other and further relief as this Court may deem appropriate and equitable, including injunctive and declaratory relief as may be required in the interests of justice.

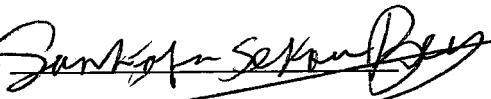
**DATED:**        **Queens, New York**  
                    July 4, 2011

By: Sarkojs Ghosh  
 erved

### NOTARY VERIFICATION

On this day, July 7, 2011, personally came before me Sankofa Bey Sekou who proved his identity to me to my satisfaction and acknowledged his signature in my presence under the complete authority and Trust in his private Sacred Religious Convictions only, and held harmless at all times.

**Declarant**

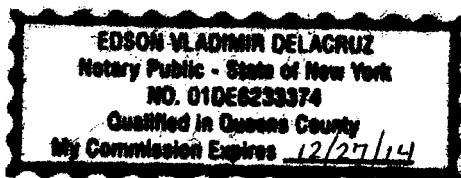
By:   
~~Sankofa Bey Sekou~~, All Rights Reserved,

**BEFORE ME, BEY SEKOU**

**NOTARY PUBLIC**



**MY COMMISSION EXPIRES ON**



TO:

MICHAEL CARDOZO

CORPORATION COUNSEL OF THE CITY OF NEW YORK

ATTORNEY OF RECORD FOR ALL DEFENDANTS

100 CHURCH STREET

ROOM 3-249

NEW YORK, NY 10007

212-788-0646

## **EXHIBIT A**

35-45 102 Street • Corona, NY 11368

<b>DELIVERY DATE:</b>		<b>TEL:</b>		<b>DATE:</b> 9-28-10	
<b>NAME:</b> Samuel					
<b>ADDRESS:</b>					
QUANTITY	DESCRIPTION	PRICE	AMOUNT		
	windsor BIKE		140		
	(700) w/the				
	USE BIKE				
		TOTAL		V	
		TAX			
		SUB TOTAL		140	
		DEPOSIT			
		BALANCE			

Signed \_\_\_\_\_

NO RETURNS OR EXCHANGES  
NO REFUNDS



This posting has been published.

Your posting can be seen at <http://newyork.craigslist.org/que/bik/1978510164.html>.

To edit or delete it use the buttons below:

[edit](#)      [delete](#)

[Back to Craigslist](#) | [Return to my account page](#)

## windsor single speed 56cm frame - \$280 (qns 11368)

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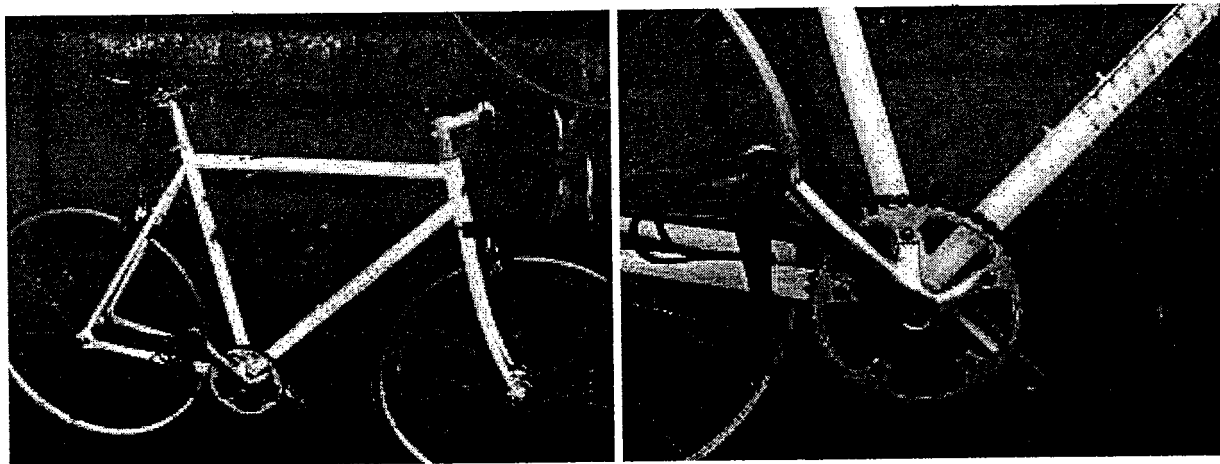
Date: 2010-09-28, 4:11PM EDT

Reply to: [sale-7ejab-1978510164@craigslist.org](mailto:sale-7ejab-1978510164@craigslist.org) [Errors when replying to ads?]

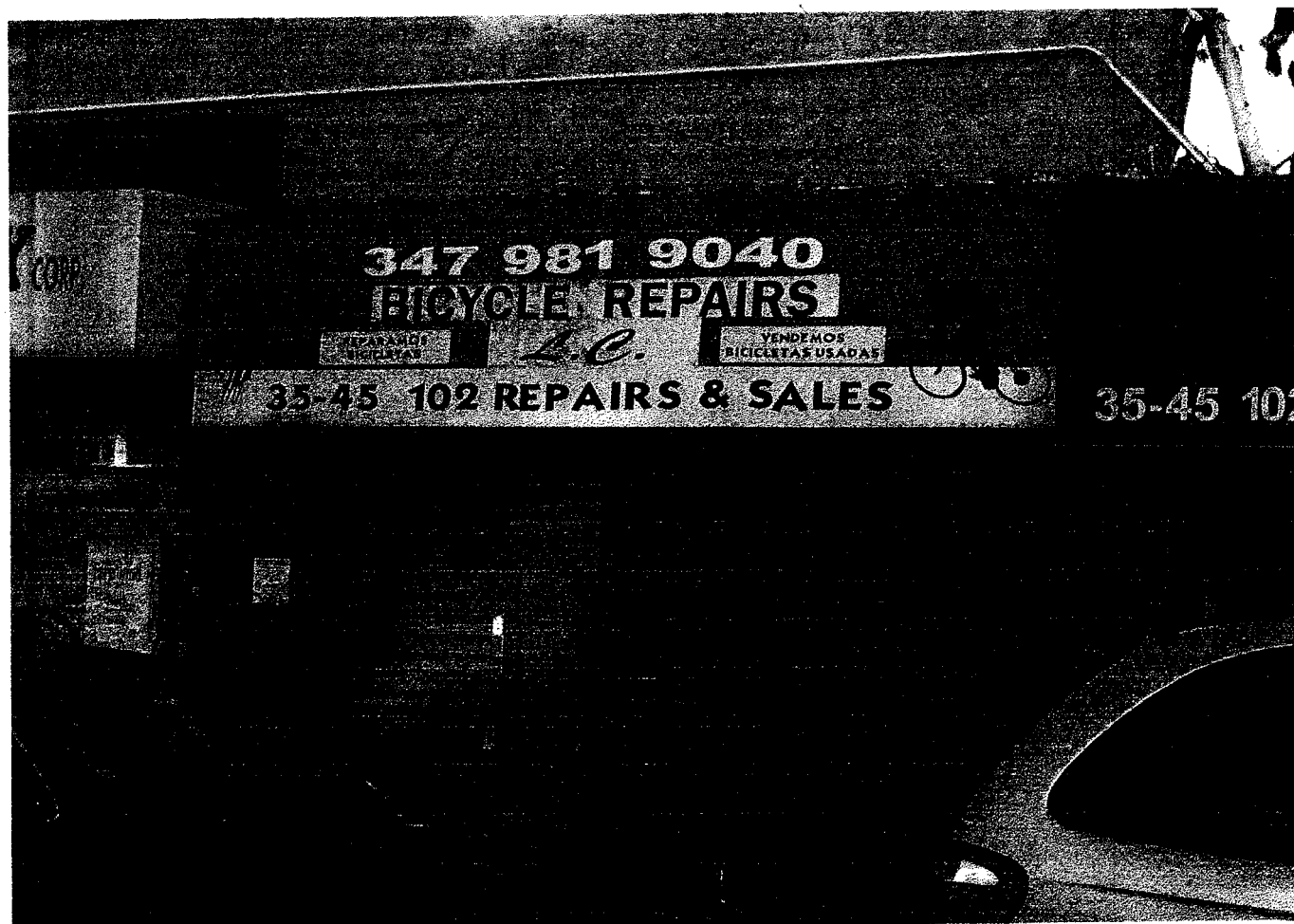
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Windsor 41-30 Cro-moly tubing frame, continental gator hardshell tires hand made in Germany, Crank by Lasco, Formula hubs and rims Frame is 22 inch not sure if that converts to 56cm (maybe). Both front and back brakes. Selling for \$280. If interested contact me by email/txt/call 3476661822

- Location: qns 11368
- it's NOT ok to contact this poster with services or other commercial interests



## **EXHIBIT C**



CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

THE PEOPLE OF THE STATE OF NEW YORK  
VS

BEY, SEKOU  
Defendant

[REDACTED]  
Address

[REDACTED]  
City State Zip

Docket Number: 2010QN057346

165.40  
Arraignment Charges

CERTIFICATE OF DISPOSITION  
NUMBER: 171793

[REDACTED]  
Date of Birth

[REDACTED]  
NYSID Number

09/28/2010  
Date of Arrest/Issue

Summons No:

Case Disposition Information:

<u>Date</u>	<u>Court Action</u>
01/12/2011	DISMISSED AND SEALED

<u>Judge</u>
MELENDEZ, S

<u>Part</u>
JP1

**SEALED**

NO FEE CERTIFICATION

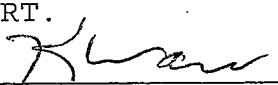
**in pursuant to Section 160.50 of the CPL**

☐ GOVERNMENT AGENCY ☐ COUNSEL ASSIGNED

☐ NO RECORD OF ATTORNEY READILY AVAILABLE. DEFENDANT STATES COUNSEL WAS ASSIGNED

SOURCE ☐ ACCUSATORY INSTRUMENT ☐ DOCKET BOOK/CRIMS ☐ CRC3030 [CRS963]

I HEREBY CERTIFY THAT THIS IS A TRUE EXCERPT OF THE RECORD ON FILE IN  
THIS COURT.

WARE, K   
COURT OFFICIAL SIGNATURE AND SEAL

05/19/2011  
DATE

FEE: NONE

(CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT  
SEAL OVER THE SIGNATURE OF THE COURT OFFICIAL.)